YAKIMA REGIONAL
CLEAN AIR
AGENCY

329 North First Street, Yakima WA 98901
Phone: (509) 834-2050 Fax: (509) 834-2060
Website: http://www.yakimacleanair.org

July 29, 2010

Mrs. Wendy Mifflin
Solid Waste Division Manager
Yakima County Public Services
7151 Roza Hill Drive
Yakima, WA 98901

RE: Partial Compliance Evaluation (PCE); Notice of Determination

Mrs. Mifflin:

On July 14, 2010 this office conducted a Partial Compliance Evaluation (PCE) of you facility in accordance with the Yakima Regional Clean Air Agency's (YRCAA) Compliance Assurance Program. The evaluation consisted of an on-site inspection to determine compliance with Air Operating Permit y-004-01 and New Source Review Portable and Temporary NSRPT-03-YCPS-09. A copy of the inspection report is enclosed for your review.

During the visit the violation listed below resulted in Terrace Heights Landfill being out of Compliance;

- Washington Administrative Code (WAC) 173-400-110 (3); Failure to submit a New Source Review (NSR) and obtain an order of approval for operation of the LFG collection system without air emission controls.

As noted in the Inspection Report, the identified violation will be addressed through the use of the YRCAA Enforcement Program.

If you have any questions please feel free to contact me at 834-2050, ext. 107.

Sincerely,

Jenny Filipy

Jenny Filipy
Engineer/Planner

Encl.

YAKIMA REGIONAL CLEAN AIR AUTHORITY INSPECTION REPORT

1. General Information:

1.1 Facility

1.1.1 Company Name: Terrace Heights Landfill (THL)

1.1.2 Type of Business: Municipal Solid Waste (MSW) Landfill Facility

1.1.3 Mailing Address: Yakima County Public Services, Solid Waste Division, 7151 Roza Hill Drive, Yakima, WA. 98901

1.1.4 Facility Location: 7151 Roza Hill Drive, Yakima, WA. 98901

1.1.5 Contact Name: Wendy Mifflin, Solid Waste Division Manager;

1.1.6 Contact Phone: (509) 574-2455

1.2 Inspection

1.2.1 Date of Inspection: July 14, 2010

1.2.2 YRCAA Inspector: Keith Hurley, Mark Edler and Jenny Filipy

1.2.3 Inspection Rationale: The site visit is a routine partial compliance evaluation and is conducted to determine compliance with Air Operating Permit (AOP) regulations and any New Source Review (NSR) in terms of operations, maintenance, monitoring and recordkeeping.

1.2.4 Inspection Goals:

1.2.4.1 Gather information adequate to determine compliance with AOP, regulations and orders applicable to operations, maintenance, monitoring and recordkeeping.

1.2.4.2 Gather information to identify permitting and reporting requirement issues.

1.2.5 Inspection Summary: The site visit started with an in-brief with Wendy Mifflin and Dan Brulotte, during which time asbestos control measures and the landfill methane generation issues were discussed. Keith began the conversation with a recent issue of suspect Asbestos Containing Material (ACM) that was taped off by our office and then deposited and buried at the landfill without proper containment. Keith asked Wendy to prepare a letter detailing control procedures that THL will take, so that this type of issue will be dealt with properly in the future. Wendy agreed to the correspondence and added that once they became aware of suspect ACM, they flagged off the site where it was buried, so they can proceed with proper handling of the material if necessary. After inquiry into what plans they had to deal with the methane area located to the north of the site, Wendy said that they were beginning to investigate further with three test wells planned to be set up in coming months and a report out by November. We asked Wendy if any one was certified to do opacity readings and she said that there are two people certified including Dan Brulotte and they were conducting monthly readings on the chipper and routine opacity inspections on the rest of the facility.

Wendy was interested in a response to two letters she had sent to us. One regarding a replacement of an aerosol can crusher in the Household Hazardous Waste Facility and another letter detailing comments on the reissued Air Operating Permit (AOP). I told her we would look into the two correspondences and get back to her about them. We informed her that our visit would fulfill the 2010 site visit requirement for THL's Full Compliance Evaluation. Wendy and Dan then led us on a tour of the facility.

2. Specific Information:

2.1 Description of Processes: THL provides opportunity for garbage haulers to salvage and recycle lead-acid batteries, white goods, tires, and other waste materials in separate facilities. A designated area to receive yard debris and wood wastes is available where such deposited

Special Wastes

THL receives Biomedical Wastes, provided Medical Sharps and other items that can break or cut handlers are packaged in bright orange or yellow bags marked "Medical Waste". While being placed in the landfill, these items are required to be pushed as close to the face as possible and buried carefully to avoid breaking bags.

Agricultural Wastes generated include crop processing wastes, bins, pallets, cold storage and warehouse wastes and manure from stock yards. Only wood wastes and papers generated in agriculture operations generally end up being disposed in THL. When separated out, clean wood wastes are chipped as described above and paper wastes are deposited in the recycling bins.

2.2 **Air Emission Units:** The following Emission Units (EU's) were observed during normal Landfill operations; the Paints and Solvents Collection Area located inside the Moderate Risk Household and Small Business Waste Building, the Hazardous Waste Disposal Area, the ACM Disposal Area, the Yard Debris/Wood Waste Reclaim Area, Chipper Operations, the Recycling Area, the Transfer Station, Propane/Natural Gas Flare System Unit, and the Landfill Gas (LFG) Collection System.

2.2.3 **Fugitive Sources Inspected:** The most significant air pollutants from MSW Landfill Operations are Volatile Organic Compounds (VOC's) synonymous to Non-Methane Organic Compounds (NMOC's), and methane (CH_4), produced as gaseous landfill emissions. These pollutants are generated during natural decomposition of biodegradable materials buried in the landfill. The gasses permeate through the porous topsoil and eventually escape to the ambient air as fugitive emissions. NMOC's contain Hazardous Air Pollutants (HAPs), as defined in the Federal Clean Air Act (FCAA) Section 112 (b), and Toxic Air Pollutants (TAPs), as defined in the Washington Administrative Code (WAC) 173-460-160. VOC's are also generated during the collection of paints and solvents inside the Moderate Risk Household and Business Hazardous Wastes building through vents and open doors. There are some quantities of Diesel Fuel Emissions during the operation of the chipper. Particulate Matter, in the form of dust, is emitted on-site during back-fill and bulldozing operations which provide cover soil for the deposited refuse. On-site dust is also generated from excessive vehicle travel on paved and unpaved roadways, by wind erosion acting on loose cover soil, and by wind blown materials from chipping/grinding of wood waste and yard debris. Wind erosion may occur from storage piles of compost material.

3. Applicable Requirements:

3.1 YRCAA Permits: Air Operating Permit No. Y-004-01
New Source Review Portable and Temporary NSRPT-03-YCPS-09

3.2 YRCAA Regulation 1: Article 3 (Rules)
Article 4 (Permits & Registration)

3.3 Washington Administrative Code (WAC): 173-400 (General Regulations for Air Pollution Sources)
173-401 (Operating Permits)
173-460 (Controls for New Sources of Toxic Air Pollutants)

7. Safety Equipment:

7.1 Safety Glasses, Hearing Protection, Hard Hat, Leather Gloves, and Steel Toe Shoes.

8. Compliance Assurance Determination

8.1 Inspector Determination

8.1.1 This determination is based on the following actions:

8.1.1.1 Review of Source Files

8.1.1.2 On Site Inspection, including (check each aspect inspected):

- ☑ On-site record keeping;
- ☐ Written operations & maintenance procedures;
- ☐ Upset/Breakdown reporting procedures;
- ☐ Operation and maintenance of process and control equipment in accordance with the procedures specified in the O&M manual;
- ☑ Operation and maintenance of process and control equipment in accordance with permit conditions and regulations;
- ☐ Operation and maintenance of non-process equipment and facility grounds in accordance with permit conditions and regulations;
- ☐ MSDS on file.

8.1.2 Inspector Certification

Based on the above actions, I find the source:

- ☐ No Violations Noted
- ☑ Out of Compliance (specify violations below)
  Washington Administrative Code (WAC) 173-400-110 (3); Failure to submit a New Source Review (NSR) and obtain an order of approval for operation of the LFG collection system without air emission controls.
- ☐ Unable to determine

Mark Edler
Inspector

July 14, 2010
Date Inspected